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Attorneys for Interested Parties

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PG&E CORPORATION,

and
PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

Case No. 19-30088 (Jointly Administered)

Chapter 11

**JOINDER TO MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO 11 U.S.C.
§§ 105(a), 501 AND FED. R. BANKR. P.
3001(a), 3003(c), 5005 AND 9007 FOR
ENTRY OF AN ORDER (I)
ESTABLISHING A BAR DATE FOR
FILING FIRE CLAIMS, (II)
APPROVING THE FORM AND
PROCEDURES FOR NOTICE OF THE
BAR DATE FOR FIRE CLAIMS, AND
(III) APPROVING SUPPLEMENTAL
PROCEDURES FOR NOTICE OF THE
BAR DATE TO FIRE CLAIMANTS**

Affects:

- ☐ PG&E Corporation
☐ Pacific Gas & Electric Company
☒ Both Debtors

Hearing Date and Time:

Date: June 26, 2019

Time: 9:30 a.m. (Pacific Time)

Place: Courtroom 17

450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102

1 Interested Parties David Herndon, Julia Herndon, Gabriell Herndon, Jedidiah Herndon,
2 Estefania Miranda, Steven Jones, Gabriella's Eatery, Chico Rent-a-Fence, and Ponderosa Pest &
3 Weed Control, victims of the 2018 Camp Fire and plaintiffs in the adversary proceeding known as
4 *Herndon, et al. v. PG&E Corporation, et al.*, Adv. No. 19-03005, hereby join in, and incorporate
5 by this reference, the *Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§*
6 *105(a), 501 and Fed. R. Bankr. P. 3001(a), 3003(c), 5005 and 9007 for Entry of an Order (i)*
7 *Establishing a Bar Date for Filing Fire Claims, (ii) Approving the Form and Procedures for*
8 *Notice of the Bar Date for Fire Claims, and (iii) Approving the Supplemental Procedures for*
9 *Notice of the Bar Date to Fire Claimants* [Docket No. 2297] (the "TCC Bar Date Motion"), as
10 amended by *Notice of Filing of Revised Fire Proof of Claim (Dkt. No. 1824) and Proposed*
11 *Amended Orders on (A) Motion of the Official Committee of Tort Claimants for Entry of an Order*
12 *(i) Establishing a Bar Date for Filing Fire Claims, (ii) Approving the Form and Procedures for*
13 *Notice of the Bar Date for Fire Claims, and (iii) Approving the Supplemental Procedures for*
14 *Notice of the Bar Date to Fire Claimants* [Docket No. 2605] and exhibits thereto, filed by the
15 Official Committee of Tort Claimants.

16 In further support of the TCC Bar Date Motion, the Interested Parties also expressly
17 incorporate their *Objection to Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a),*
18 *Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1 for Order (i) Establishing*
19 *Deadline for Filing Proofs of Claim, (ii) Establishing the Form and Manner of Notice Thereof,*
20 *and (iii) Approving Procedures for Providing Notice of Bar Date and Other Information to all*
21 *Creditors and Potential Creditors* [Docket No. 2240], and note that the TCC Bar Date Motion
22 does not suffer from the infirmities identified in the Interested Parties' objection to the Debtors'
23 bar date motion.¹

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26 ¹ Contrary to the Debtors' supposition that the Interested Parties "would likely support [the Debtors'] earlier bar date,"
27 *Preliminary Statement Updating the Court with Respect to the Status of the Debtors' Bar Date Motion and Related*
28 *Noticing Motions and Pleadings*, Ex. A at 4 n.4 [Docket No. 2562-1], the Interested Parties expressly support the bar
date proposed in the TCC Bar Date Motion.

1 Dated: June 19, 2019
2 Los Angeles, CA

/s/ Thomas D. Warren
Thomas D. Warren

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24 -and-

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